

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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*In re Terrorist Attacks on September 11, 2001*

03 MDL 1570 (GBD)(SN)  
ECF Case

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This document relates to the following actions, including but not limited to,  
*The Estate of John Patrick O'Neill, Sr., et al. v. The Republic of Iraq, et al.*, No. 1:04-cv-01076 (GBD)(SN)  
*Estate of John Patrick O'Neill Sr., et al. v. Al Baraka Investment and Development Corporations, et al.*, No. 1:04-cv-01923 (GBD)(SN)  
*Deborah Bodner, et al v. Islamic Republic of Iran*, No. 1:19-cv-11776 (GBD)(SN)

**NOTICE OF ATTORNEY CHARGING LIENS**

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. § 1367(a) and Judiciary Law § 475 and 475-a, the law firm of Anderson Kill P.C. and Jerry S. Goldman, Esq. hereby provides notice of Attorney Charging Liens for attorneys' fees awarded and/or received and/or distributed relating to the following former clients who are Plaintiffs in the above-referenced actions,

PLEASE TAKE FURTHER NOTICE that, pursuant to Judiciary Law § 475 and 475-a, the law firm of Anderson Kill P.C. and Jerry S. Goldman, Esq. hereby provides notice of Attorney Charging Liens for attorneys' fees to be awarded and/or to be received and/or to be distributed relating to the following former clients who are Plaintiffs in the above-referenced actions;

PLEASE TAKE FURTHER NOTICE that Anderson Kill P.C. and Jerry S. Goldman, Esq., hereby asserts charging liens upon the causes of action of said Plaintiffs, and against any and all sums representing the proceeds thereof, whether issued in accordance with settlement or otherwise, in whatever hands they may come, in an amount set forth in the parties' agreement for services.

These liens shall not be affected by any settlement between the parties before or after judgment, final order or determination.

PLEASE TAKE FURTHER NOTICE that pursuant to applicable law, anyone who disregards said lien may be held to be personally liable to Anderson Kill P.C. and Jerry S. Goldman, Esq. *See* Judiciary Law § 475; *Matter of Strage*, 2023 NY Slip Op 01062, ¶ 1 (1st Dep’t 2023); *Schneider, Kleinick, Weitz, Damashek & Shoot v. City of N.Y.*, 302 A.D.2d 183, 187 (1st Dep’t 2002); *LMWT Realty Corp. v Davis Agency, Inc.*, 85 N.Y.2d 462 (1995).

PLEASE TAKE FURTHER NOTICE that the following Plaintiffs (“the Morello Plaintiffs”) shall be subject to the attorney charging liens:

1. Deborah Temple, individually as spouse of Vincent Morello, deceased;
2. Deborah Temple as the Personal Representative of the Estate of Vincent Morello, deceased;
3. Justin Morello, individually as surviving child of Vincent Morello, deceased; and
4. Paige Morello, individually as surviving child of Vincent Morello; deceased.

The Morello Plaintiffs have claims in the instant MDL including, but not limited to, *The Estate of John Patrick O’Neill, Sr., et al. v. The Republic of Iraq, et al.*, No. 1:04-cv-01076 (GBD)(SN), *Estate of John Patrick O’Neill Sr., et al. v. Al Baraka Investment and Development Corporations, et al.*, No. 1:04-cv-01923 (GBD)(SN), *Deborah Bodner, et al v. Islamic Republic of Iran*, No. 1:19-cv-11776 (GBD)(SN).

Date: July 17, 2025

/s/ Jerry S. Goldman  
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